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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

LORRAINE L. FRIEDMAN REVOCABLE
TRUST,

Adv. Pro. No. 10-05251 (SMB)

LORRAINE L. FRIEDMAN, individually, and in
her capacity as Trustee of the Lorraine L. Friedman
Revocable Trust,

FREDERICK FRIEDMAN, in his capacity as
Trustee of the Lorraine L. Friedman Revocable
Trust,

JAY OFSINK, in his capacity as Trustee of the
Lorraine L. Friedman Revocable Trust,

and

PAUL R. COMEAU, in his capacity as Trustee of
the Lorraine L. Friedman Revocable Trust,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendants Lorraine L. Friedman Revocable Trust; Lorraine L. Friedman, individually, and in her capacity as Trustee of the Lorraine L. Friedman Revocable Trust; Frederick Friedman, in his capacity as Trustee of the Lorraine L. Friedman Revocable Trust; Jay Ofsink, in his capacity as Trustee of the Lorraine L. Friedman Revocable Trust (“Defendants”); and Paul R. Comeau, in his capacity as Trustee of the Lorraine L. Friedman Revocable Trust, by and through their counsel, Michael J. McAllister (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 6, 2010, the Trustee filed and served the Complaint against Defendants. On April 4, 2012, the Trustee filed and served an Amended Complaint against

Defendants.

2. On March 15, 2012, Defendants served an Answer on the Trustee. On April 18, 2012, Defendants filed an Answer to the Amended Complaint on the Trustee.

3. On June 20, 2014, the Parties entered into a settlement agreement pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181].

4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding and dismissing the adversary proceeding.

5. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

Date: March 11, 2015
New York, New York

Of Counsel:

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LLC and the Estate of Bernard L. Madoff*

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Attorneys for Defendants

SO ORDERED

Dated: March 11th, 2015
New York, New York

/s/ STUART M. BERNSTEIN
Hon. Stuart M. Bernstein
United States Bankruptcy Judge